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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
EASTER DISTRICT OF CALIFORNIA

ELIZABETH ANN MORENO, ) Case No. 1:22-cv-00377-EPG  
Plaintiff, )  
vs. ) STIPULATION AND ORDER FOR  
KILOLO KIJAKAZI, Acting ) EXTENSION OF TIME  
Commissioner of Social Security, ) (ECF No. 16)  
Defendant. )

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from October 14, 2022 to November 14, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR). A review of the records received shows Counsel has received at least 50 CARs, the majority of which were filed in June 2022. This has caused an unusually large number of

1 cases that have merit briefs due in the months of August and September. Additionally,  
2 undersigned counsel entered her appearance today and requires additional time to fully brief this  
3 matter.

4 For the weeks of October 10, 2022 and October 17, 2022, Counsel currently has eight  
5 merit briefs, and several letter briefs and reply briefs. Additional time is needed to thoroughly  
6 brief this matter for the Court. Defendant does not object to the requested extension. Counsel  
7 apologizes to the Court and Defendant for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: October 7, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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12 By: /s/ Dolly M. Trompeter  
13 DOLLY M. TROMPETER  
14 Attorneys for Plaintiff

15 Dated: October 7, 2022 PHILLIP A. TALBERT  
16 United States Attorney  
17 PETER K. THOMPSON  
18 Acting Regional Chief Counsel, Region IX  
Social Security Administration

19 By: \*/s/ Caspar I. Chan  
20 Caspar I. Chan  
21 Special Assistant United States Attorney  
22 Attorneys for Defendant  
(\*As authorized by email on October 7, 2022)

1                           **ORDER**  
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3                           Based on the above stipulation (ECF No. 16), IT IS ORDERED that Plaintiff shall file  
4 Plaintiff's motion for summary judgment no later than November 14, 2022. All other deadlines  
5 in the Court's scheduling order are extended accordingly.  
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7                           IT IS SO ORDERED.  
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9                           Dated: October 7, 2022  
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12                           /s/ *Evan P. Gross*  
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14                           UNITED STATES MAGISTRATE JUDGE  
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